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VIOLET BLUE

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

VIOLET BLUE, an Individual,

Plaintiff and Counter-defendant,

v.

ADA MAE JOHNSON a/k/a ADA  
WOFFINDEN, an individual d/b/a  
VIOLET BLUE a/k/a VIOLET a/k/a  
VIOLET LUST; ASSASSIN PICTURES  
INC., a California Corporation;  
ASSASSINCASH.COM; BILL T. FOX,  
an individual, a/k/a BILL FOX; FIVE  
STAR VIDEO L.C., an Arizona Limited  
Liability Company a/k/a Five Star Video  
Distributors LLC d/b/a Five Star  
Fulfillment; and DOES 1-10,

Defendants and Counter-claimants.

Case No. C 07-5370 SI

**[PROPOSED] ORDER GRANTING  
PLAINTIFF VIOLET BLUE'S  
NOTICE OF MOTION AND MOTION  
FOR PRELIMINARY INJUNCTION**

The Honorable Susan Illston  
Courtroom 10, 19th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Hearing Date: May 9, 2008  
Hearing Time: 9:00 a.m.

The motion of Plaintiff Violet Blue for a preliminary injunction enjoining Defendant and Counterclaim Plaintiff Ada Woffinden ("Woffinden"); ~~Assassin Pictures Inc., a California corporation ("Assassin"); Assassincash.com ("Cash"); Bill T. Fox, an individual, a/k/a Bill Fox ("Fox"); Five Star Video L.C., an Arizona limited liability company a/k/a Five Star Video Distributors LLC d/b/a Five Star Fulfillment ("Five Star"); and Does 1-10 (collectively~~

*her*  
 1 "~~Defendants~~", and ~~their officers, directors,~~ agents, servants, employees, ~~members,~~ attorneys,  
 2 distributors and all other persons acting or attempting to act in concert or participation with ~~them~~, *her*  
 3 came on for hearing on May 9, 2008, before this Court, the Honorable Judge Susan Illston  
 4 presiding. All interested parties were represented by counsel and given an opportunity to be  
 5 heard.

6 The Court, having read and considered the papers submitted, and having heard the  
 7 argument of counsel, hereby ORDERS as follows:

8 1. ~~Defendants,~~ *her* any associated businesses of ~~Defendants,~~ and ~~their officers, directors,~~  
 9 agents, servants, employees, ~~members,~~ attorneys, distributors, and all other persons, firms or  
 10 corporations, acting in concert and participation with ~~them~~, *he* their successors and assigns, are  
 11 hereby enjoined from:

- 12 a) using names, trademarks, and Internet domains confusingly similar to, or
- 13 identical to, Plaintiff's trademark VIOLET BLUE (including the name
- 14 "Violetta Blue");
- 15 b) infringing any of Plaintiff's trademark rights;
- 16 c) identifying themselves as Violet Blue;
- 17 d) using the phrase "Violet Blue" in association with any goods or service;
- 18 e) attempting to trade upon Plaintiff's goodwill by capitalizing on the Violet
- 19 Blue name through inclusion of "Violet Blue" history, or by referencing
- 20 her former appearances as "Violet Blue";

21 2. ~~Defendants,~~ *in* within twenty (20) calendar days of this order, ~~are to~~ cause any  
 22 Internet domain within ~~their~~ *her* control, including but not limited to <http://www.violetblue.org> and  
 23 <http://xxx.violetblue.org>, to be inactive, so that a browser directed to any such page is not aliased  
 24 to any other website and email to [anything]@violetblue.org is not delivered to any email  
 25 system.

26 3. ~~Defendants~~ *in* are to remove, within twenty (20) calendar days of this order, ~~their~~ *her*  
 27 confusingly similar trademarks and prohibited content from all materials to be distributed to the  
 28 public, including through Defendants' website.

1           4.     Defendants <sup>in</sup>are to serve this order on all individuals and/or entities who distribute  
2 any films, videos, DVDs, images, audio and/or audiovisual materials that include Woffinden  
3 appearing under the name "Violet Blue" and/or any name confusingly similar to Plaintiff's  
4 trademark VIOLET BLUE (including "Violetta Blue").  
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6           **IT IS SO ORDERED.**

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8     Dated: 5/9/08



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10                                   THE HONORABLE SUSAN ILLSTON  
11                                   UNITED STATES DISTRICT COURT JUDGE  
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